

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 3:18 CR 30172 NJR
vs.)	
)	
JACE A. FAUGNO,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO CONTINUE SENTENCING

COMES NOW Defendant Jace Faugno, by and through his attorney, Mark A. Hammer (“counsel”), and respectfully requests a continuance of his sentencing currently scheduled for January 6, 2021 for about three to four weeks. This motion is made on the following grounds:

- 1) Counsel and his family have had recurring illnesses that have compromised counsel’s ability to properly attend to several matters, including preparation for Defendant’s sentencing. Counsel just recently hired a new associate for the firm to catchup on these matters so that further delays should not be necessary.
- 2) Defendant continues to do well on pretrial release at his home in Kentucky.
- 3) Should the Court agree to continue the matter, Defendant would agree to sentencing by video teleconference appearance to avoid travel from Kentucky, unnecessarily exposing himself, his counsel or the Court and staff in the Southern District of Illinois.
- 4) Counsel has spoken to AUSA Christopher Hoell who has *no objection*, and consents to the proposed continuance.

For these reasons, Defendant respectfully requests that his sentencing be continued for about three to four weeks. This will be Defendant's last request to continue this matter and we will be prepared to proceed to sentencing at the next date to avoid further delay. Counsel regrets the late notice to the Court on this matter.

Respectfully submitted,

/s/ Mark A. Hammer

Mark A. Hammer, MO Bar #61542
The Hammer Law Firm, LLC
100 Chesterfield Business Pkwy, Ste 200
Chesterfield, MO 63005
314-651-9311

CERTIFICATE OF SERVICE

I certify that, on January 5, 2021, a copy of this document was electronically filed with the Clerk of Court, and served on all counsel of record, by the CM-ECF system.

/s/ Mark A. Hammer
